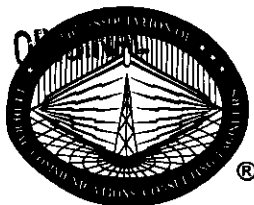


DOCKET FILE COPY OF



ASSOCIATION OF

FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D.C.

August 3, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, Room TW-B204
Washington, DC 20554

FILED/ACCEPTED
AUG - 3 2007
Federal Communications Commission
Office of the Secretary

Re: Request for Extension of the August 8, 2007
Deadline for the Notice of Proposed Rule Making,
MB Docket No. 07-91

Dear Ms. Dortch:

The Association of Federal Communications Consulting Engineers (AFCCE), celebrating over 50 years, is an organization that includes approximately 90 full members who are Registered Professional Engineers engaged in the practice of consulting engineering before the Federal Communications Commission. In addition, AFCCE represents over 160 associate members in allied companies such as equipment manufacturers, service providers, government agencies and communications law professionals.

This letter is to request that an extension be given to the outstanding deadline of August 8, 2007 concerning the request for comments in the *Notice of Proposed Rule Making Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion*. The Commission seeks information over a wide range of issues all relating to the implementation of DTV by February 17, 2009 and the termination of analog for public off-the-air transmission. There are several reasons in which this request is made. Briefly, consulting engineering firms and industry find that:

- There are a multitude of engineering details that must be reviewed in order to comment of the Third Periodic Review
- The ability to adequately comment and analyze the various technical issues to arrive at a cost effective and timely process to give opinions to clients and their attorneys to achieve a coordinated response is a lengthy and involved process and

No. of Copies rec'd at 3
List ABCDE

for some stations such as educational stations, there is a need to have available the final table which will provide, among other things, the ERP and pattern. Most educational stations need to go through an RFP process. To go through the RFP process requires knowledge of the transmitter size, the size of the transmitter room and AC power requirements. Further, that will also entail developing the closest fit pattern to that specified in the final table. Other commercial stations trying to make prudent and final equipment decisions also would similarly benefit.

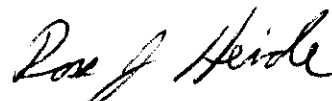
- Some of this process cannot be anticipated in advance of the final issuance of the Table of Allotments in the Seventh Further Notice of Proposed Rule Making.

The AFCCE recognizes the importance of developing the pathway to achieve digital transmission in an efficient and expeditious manner while minimizing disruption to off-the-air NTSC and DTV transmission as soon as constructively feasible and it recognizes the importance of validating the technical data published in the Seventh Further Notice. AFCCE recognizes that the Third Periodic Review is a very important step and applauds the Commission's efforts as AFCCE believes it represents a valuable contribution to the ultimate final step that will guide industry for the next eighteen months in the complicated transition process. Unfortunately, having less than ninety (90) days abbreviated by two major holidays is an insufficient amount of time in which to make use of all possible information to develop comprehensive comments. It is believed these additional comments will assist the Commission in its task to develop rules and guidelines and will result in a station being on that channel with those facilities for the foreseeable future, and therefore, extra time is required to examine all technical parameters and so as to minimize disruption to off-the-air viewers and conserve valuable FCC resources.

It is herein requested that the Commission permit a 21-day extension of the August 8, 2007 deadline which will give industry approximately 90 days to respond. The additional time will allow further analysis of the final DTV Table in the Seventh Further Notice as it relates to the Third Periodic Review.

If there are any questions, please do not hesitate to contact this office.

Respectfully Submitted,



Ross J. Heide
President